

November 22, 2002

Docket Management
Room PL-401
400 Seventh Street, SW
Washington, DC 20590

Reference: **NHTSA-2002-12065**

Federal Motor Vehicle Safety Standards; Child Restraint Systems (NHTSA, DOT)

These comments are provided as a petition in support for final rulemaking in favor of the Interim Final Rule on subject matter above. I'm employed by the Transportation Services Department as the Training/Safety Specialist of the Killeen Independent School District. I'm also a NHTSA Certified Child Passenger Safety Technician/Instructor. Recently, our district experienced a major school bus accident without major injuries in early October 2002. As such, we were able to assess the benefits firsthand of cam wraps used to secure child restraint systems. There were two students secured by safety vests (harness) with cam straps at the time of the accident that escaped unharmed. Six students, also unharmed, were secured by cam wrapped - padded lap restraint belts. When emergency evacuation began, first responders found all students still in their seats, as the bus rested on its' right side. The wheelchair student was still in his secured chair. The bus damages were totaled out. Every seat occupied, or not (due to expansions) on our special needs buses is to be equipped with/for child restraint systems and/or seatbelts, before use. What a district must consider and remember is the application of weight restrictions for the use of a particular CRS. I believe that this method of securement is acceptable, as long as drivers and attendants (monitors or aides) pre-trip and post-trip this equipment and make certain that they are firmly secured to the seatback. They must also consistently insure that the students are firmly secured in the restraint device. I understand that the seat back might not be able to withstand the additional load applied to it by an attached, occupied child restraint, but in the event that all seats are occupied by other restrained children, the seatbacks continue to provide additional, compartmentalized protection.

Respectfully,

D. JENNINGS
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